

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Hearing Date: April 17, 2025 at 10:00 a.m. (ET)

Obj. Deadline: January 31, 2025 at 4:00 p.m. (ET)

**FINAL FEE STATEMENT OF LANDIS RATH & COBB LLP AS BANKRUPTCY CO-  
COUNSEL TO THE DEBTORS AND DEBTORS-IN-POSSESSION FOR  
COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND  
REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD  
FROM NOVEMBER 11, 2022 THROUGH AND INCLUDING OCTOBER 8, 2024**

<b>Name of Applicant</b>	<b>Landis Rath &amp; Cobb LLP</b>
Authorized to Provide Professional Services to:	the Debtors and Debtors-in-Possession
Date of Retention:	January 9, 2023 <i>nunc pro tunc</i> to November 11, 2022
Final Period for which compensation and reimbursement is sought:	November 11, 2022 through and including October 8, 2024
Amount of Final Compensation sought as actual, reasonable and necessary:	\$12,234,226.75
Amount of Final Expense Reimbursement sought as actual, reasonable, and necessary:	\$232,294.85

This is a(n) \_\_\_\_ monthly \_\_\_\_ interim **x** final application. No prior application has been filed with respect to this Fee Period.

<sup>1</sup> The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

**PRIOR FEE STATEMENTS FILED**

<b>Date Filed</b>	<b>Period Covered</b>	<b>Requested Fees</b>	<b>Requested Expenses</b>	<b>Approved<sup>2</sup> Fees</b>	<b>Approved Expenses</b>
2/7/2023	11/11 – 12/31/2022	\$1,155,186.50	\$16,008.71	\$924,149.20	\$16,008.71
3/6/2023	1/1 – 1/31/2023	\$663,695.50	\$20,696.39	\$530,956.40	\$20,696.39
3/17/2023 <b>(First Interim)</b>	11/1 – 1/31/2023	\$1,818,882.00	\$36,705.10	\$1,801,382.00	\$36,705.10
4/4/2023	2/1 – 2/28/2023	\$582,604.00	\$10,522.10	\$466,083.20	\$10,522.10
4/28/2023	3/1 – 3/31/2023	\$639,694.00	\$4,638.18	\$511,755.20	\$4,638.18
6/1/2023	4/1 – 4/30/2023	\$432,505.00	\$2,343.66	\$346,004.00	\$2,343.66
6/15/2023 <b>(Second Interim)</b>	2/1 – 4/30/2023	\$1,654,803.00	\$17,503.94	\$1,597,853.00	\$17,503.94
6/30/2023	5/1 – 5/31/2023	\$334,060.00	\$8,046.50	\$267,248.00	\$8,046.50
8/1/2023	6/1 – 6/30/2023	\$466,634.00	\$17,677.75	\$373,307.20	\$17,677.75
8/30/2023	7/1 – 7/31/2023	\$327,227.50	\$3,080.88	\$261,782.00	\$3,080.88
9/15/2023 <b>(Third Interim)</b>	5/1 – 7/1/2023	\$1,127,921.50	\$28,805.13	\$1,091,850.25	\$28,805.13
9/29/2023	8/1 – 8/31/2023	\$396,808.50	\$10,377.73	\$317,446.80	\$10,377.73
10/31/2023	9/1 – 9/30/2023	\$324,074.00	\$6,586.88	\$259,259.20	\$6,586.88
11/29/2023	10/1 – 10/31/2023	\$353,164.50	\$5,308.99	\$282,531.60	\$5,308.99
12/15/2023 <b>(Fourth Interim)</b>	8/1 – 10/31/2023	\$1,074,047.00	\$22,273.60	\$1,047,788.60	\$22,273.60
12/22/2023	11/1 – 11/30/2023	\$345,263.50	\$7,846.63	\$276,210.80	\$7,846.63
1/31/2024	12/1 – 12/31/2023	\$349,562.50	\$4,128.50	\$279,650.00	\$4,128.50
2/29/2024	1/1 – 1/31/2024	\$591,561.50	\$11,663.33	\$473,249.20	\$11,663.33
3/15/2024 <b>(Fifth Interim)</b>	11/1/2023 – 1/31/2024	\$1,286,387.50	\$23,638.46	\$1,268,995.75	\$23,627.49
3/28/2024	2/1 – 2/29/2024	\$583,267.00	\$7,119.87	\$466,613.60	\$7,119.87
4/26/2024	3/1 – 3/31/2024	\$667,850.75	\$18,572.84	\$534,280.60	\$18,572.84
5/31/2024	4/1 – 4/30/2024	\$482,536.50	\$1,955.67	\$386,029.20	\$1,955.67
6/14/2024 <b>(Sixth Interim)</b>	2 /1 – 4/30/2024	\$1,733,654.25	\$27,648.38	\$1,704,004.25	\$27,648.38
7/5/2024	5/1 – 5/31/2024	\$569,632.00	\$2,074.45	\$455,705.60	\$2,074.45
7/31/2024	6/1 – 6/30/2024	\$607,884.50	\$22,293.72	\$486,307.60	\$22,293.72
8/29/2024	7/1 – 7/31/2024	\$688,073.00	\$6,299.01	\$550,458.40	\$6,299.01
9/13/2024 <b>(Seventh Interim)</b>	5/1 – 7/31/2024	\$1,865,589.50	\$30,667.18	\$1,837,964.75	\$30,667.18
9/30/2024	8/1 – 8/31/2024	\$658,518.50	\$4,033.14	\$526,814.80	\$4,033.14
10/31/2024	9/1 – 9/30/2024	\$719,128.50	\$11,818.07	\$575,302.80	\$11,818.07
11/15/2024	10/1 – 10/8/2024	\$295,295.00	\$29,201.85	\$236,236.00	\$29,201.85

<sup>2</sup> Approved amounts reflect LRC's agreed reductions with the Fee Examiner.

Date Filed	Period Covered	Requested Fees	Requested Expenses	Approved <sup>2</sup> Fees	Approved Expenses
12/16/24 (Eighth Interim)	8/1 – 10/8/2024	\$1,672,942.00	\$45,053.06	Pending	Pending

**SUMMARY OF FINAL COMPENSATION BY PROFESSIONAL  
NOVEMBER 11, 2022 THROUGH AND INCLUDING OCTOBER 8, 2024**

Timekeeper Name	Position <sup>3</sup>	Year of Admission	Year of Law School Graduation	Hourly Rate <sup>4,5</sup>	Total Hours Billed	Total Compensation
Adam G. Landis	Partner	NY 1992, MA 1992, DE 1996	May, 1991	\$1,275	404.4	\$515,610.00
				\$1,150	666.8	\$766,820.00
				\$1,075	302.1	\$324,757.50
				\$575	3.7	\$2,127.50
Richard S. Cobb	Partner	DE 1993, PA 1994	May, 1992	\$1,275	169.3	\$215,857.50
				\$1,150	2.3	\$2,645.00
Rebecca L. Butcher	Partner	DE 1999, PA 2000	May, 1999	\$1,025	1.8	\$1,845.00
				\$900	7.5	\$6,750.00
				\$830	0.8	\$664.00
Matthew B. McGuire	Partner	PA 2001, DE 2003	May, 2000	\$1,025	498.8	\$511,270.00
				\$900	447.6	\$402,840.00
				\$830	4.8	\$3,984.00
Kimberly A. Brown	Partner	DE 2008	May, 2008	\$925	1,475.1	\$1,364,467.50
				\$820	1795	\$1,471,900.00
				\$750	412.5	\$309,375.00
				\$462.50	1.7	\$786.25
Matthew R. Pierce	Partner	DE 2013	May, 2013	\$750	1,168.3	\$876,225.00
				\$375	3.7	\$1,387.50
Jennifer L. Cree	Partner	DE 2013, PA 2014	May, 2013	\$750	1.4	\$1,050.00
<b>Partner Total</b>					<b>8,839.8</b>	<b>\$7,700,786.75</b>
Matthew R. Pierce	Associate	DE 2013	May, 2013	\$625	1,474.9	\$921,812.50
				\$550	425.1	\$233,805.00
Jennifer L. Cree	Associate	DE 2013, PA 2014	May, 2013	\$625	1.2	\$750.00
Nicolas E. Jenner	Associate	DE 2018	May, 2018	\$600	918	\$550,800.00
				\$525	892.7	\$468,667.50
				\$450	124.1	\$55,845.00

<sup>3</sup> In the ordinary course of business, certain timekeepers positions changed in the ordinary course of practice due to advancement as set forth in more detail in the relevant Monthly Fee Statement.

<sup>4</sup> Effective on January 1<sup>st</sup> of each year LRC implemented annual step increases in its hourly rates consistent with LRC's ordinary course practice due to advancing seniority and promotion.

<sup>5</sup> Non-working travel was billed at 50% of the then applicable hourly rate during the Final Fee Period.

Timekeeper Name	Position <sup>3</sup>	Year of Admission	Year of Law School Graduation	Hourly Rate <sup>4,5</sup>	Total Hours Billed	Total Compensation
Howard W. Robertson	Associate	PA 2020, DE 2021	January, 2020	\$535	464.1	\$248,293.50
				\$475	1,521.6	\$722,760.00
				\$410	332.4	\$136,284.00
Elizabeth A. Rogers	Associate	NY 2021, DE 2024	May, 2019	\$535	344.5	\$184,307.50
George A. Williams	Associate	DE 2022	May, 2021	\$450	1,612.6	\$725,670.00
				\$395	188.2	\$74,339.00
Clifford R. Wood, Jr.	Associate	DE 2022, PA 2023	May, 2022	\$395	626.9	\$247,625.50
<b>Associate Total</b>					<b>7,455.1</b>	<b>\$3,650,534.50</b>
<b>Lawyers Total</b>					<b>16,293.9</b>	<b>\$11,351,321.25</b>
Melissa Ramirez	Paralegal	N/A	N/A	\$350	650.8	\$227,780.00
				\$310	714.6	\$221,526.00
				\$295	156.5	\$46,167.50
Linda M. Rogers	Paralegal	N/A	N/A	\$350	8.3	\$2,905.00
Mark Hitchens	Paralegal	N/A	N/A	\$350	350.8	\$122,780.00
				\$310	48.8	\$15,128.00
Jennifer Ford	Paralegal	N/A	N/A	\$350	88.2	\$30,870.00
Anthony C. Dellose	Paralegal	N/A	N/A	\$310	174.0	\$53,940.00
				\$295	133.1	\$39,264.50
Alicia Bianco	Paralegal	N/A	N/A	\$310	10.2	\$2,805.00
Joshua Huynh	Paralegal, Legal Assistant	N/A	N/A	\$310	102.5	\$31,775.00
				\$275	284.3	\$78,182.50
				\$200	1.9	\$380.00
				\$180	11.1	\$1,998.00
Allison Strauss	Legal Assistant	N/A	N/A	\$220	8.1	\$1,782.00
				\$200	9.6	\$1,920.00
				\$180	16.9	\$3,042.00
Tanita Davenport	Legal Assistant	N/A	N/A	\$220	3.0	\$660.00
<b>Non-Legal Personnel Total</b>					<b>2,772.7</b>	<b>\$882,905.50</b>
<b>GRAND TOTAL</b>					<b>19,066.6</b>	<b>\$12,234,226.75</b>

**Blended Hourly Rate: \$641.66**

**SUMMARY OF FINAL COMPENSATION BY PROJECT CATEGORY<sup>6</sup>**  
**NOVEMBER 11, 2022 THROUGH AND INCLUDING OCTOBER 8, 2024**

<b>Project Name</b>	<b>Hours</b>	<b>Fee Amount</b>
B110 - Asset Analysis and Recovery	102.0	\$74,175.50
B112 - Asset Disposition	930.5	\$645,499.50
B114 - Assumption/Rejection of Leases and Contracts	162.3	\$101,958.00
B118 - Board of Directors Matters	5.5	\$5,781.50
B120 - Business Operations	1,198.9	\$745,645.00
B122 - Case Administration	872.1	\$435,933.50
B124 - Claims Administration & Objections	2,574.1	\$1,545,944.50
B126 - Employee Benefits/Pensions	73.4	\$49,085.50
B130 - Financing/Cash Collateral	3.1	\$2,433.00
B134 - Hearings	2,227.5	\$1,330,646.00
B135 - Litigation	3,764.8	\$2,582,599.50
B136 - LRC Retention & Fee Matters	455.8	\$272,504.50
B138 - Committee Meetings/Communications	43.6	\$33,305.50
B139 - Equity Committee	2.9	\$3,172.50
B140 - Creditor Inquiries	177.6	\$112,098.50
B142 - Non-working Travel	9.1	\$4,301.25
B144 - Non-LRC Retention & Fee Matters	1,187.6	\$736,503.00
B146 - Plan and Disclosure Statement (including Business Plan)	1,823.4	\$1,332,824.00
B150 - Relief from Stay/Adequate Protection Proceedings	277.2	\$179,254.50
B151 - Schedules/Operating Reports	887.5	\$545,101.00
B152 - Tax Issues	61.8	\$46,001.00
B154 - LRC Retention Applications & Disclosures	56.0	\$32,813.50
B155 - Non-LRC Retention Applications & Disclosures	268.3	\$176,575.50
B156 - LRC Fee Applications	734.6	\$470,541.00
B157 - Non-LRC Fee Applications	691.1	\$367,969.00
B160 - Examiner	475.9	\$401,560.50
<b>TOTAL</b>	<b>19,066.60</b>	<b>\$12,234,226.75</b>

<sup>6</sup> The subject matter of certain time entries may be appropriate for more than one project category. In such instances, time entries generally have been included in the most appropriate category. Time entries do not appear in more than one category.

**SUMMARY OF ACTUAL AND NECESSARY FINAL EXPENSES**  
**NOVEMBER 11, 2022 THROUGH AND INCLUDING OCTOBER 8, 2024**

<b>Disbursement Summary</b>		
<b>Expense Category</b>	<b>Service Provider, if Applicable</b>	<b>Amount</b>
In-house Copying	N/A	\$11,037.20
Outside Printing	<i>See previous Monthly Fee Applications</i>	\$92,777.73
Telephone	N/A	\$49.41
Online research	<i>See previous Monthly Fee Applications</i>	\$24,046.99
Delivery Services/Messengers	<i>See previous Monthly Fee Applications</i>	\$9,191.19
Out-of-Town Travel	<i>See previous Monthly Fee Applications</i>	\$8,970.63
Meals	<i>See previous Monthly Fee Applications</i>	\$20,107.38
eDiscovery	TechSolutions, Inc.	\$88.95
Inhouse Color Copies	N/A	\$9,703.20
Document Retrieval	PACER	\$2,052.60
Filing Fee	US Bankruptcy Court	\$13,861.00
Hearing Transcripts	Reliable	\$23,707.36
Service Fees	<i>See previous Monthly Fee Applications</i>	\$14,907.28
Overnight Delivery	<i>See previous Monthly Fee Applications</i>	\$930.65
Conference Call Service	LoopUp LLC	\$33.28
Telephonic Court Appearance	CourtSolutions	\$210.00
Lien Searches	Delaware Division of Corporations	\$20.00
Rentals	Capital Office	\$600.00
<b>TOTAL</b>		<b>\$232,294.85</b>

**CUSTOMARY AND COMPARABLE COMPENSATION  
DISCLOSURES FOR THE FINAL COMPENSATION PERIOD OF  
NOVEMBER 11, 2022 THROUGH AND INCLUDING OCTOBER 8, 2024**

Category of Timekeeper	Blended Hourly Rate	
	Billed Firm-wide for Fiscal Year (FY2024)	Billed November 11, 2022 through and including October 8, 2024
Partner	\$953.39	\$856.24
Associate	\$501.90	\$486.06
Paralegal	\$345.78	\$320.10
Aggregated	\$695.29	\$642.52

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**FINAL FEE STATEMENT OF LANDIS RATH & COBB LLP AS BANKRUPTCY CO-  
COUNSEL TO THE DEBTORS AND DEBTORS-IN-POSSESSION FOR  
COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND  
REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD  
FROM NOVEMBER 11, 2022 THROUGH AND INCLUDING OCTOBER 8, 2024**

Landis Rath & Cobb LLP (“LRC”), bankruptcy co-counsel to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession in the above-captioned cases (collectively, the “Debtors”), hereby submits this *Final Fee Statement of Landis Rath & Cobb LLP as Bankruptcy Co-Counsel to the Debtors and Debtors-In-Possession for Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period From November 11, 2022 Through and Including October 8, 2024* (the “Final Fee Statement”) for final allowance of compensation for professional services rendered and reimbursement of expenses incurred for the period from November 11, 2022 through and including October 8, 2024 (the “Final Fee Period”). In support of the Final Fee Statement, LRC respectfully states as follows:

**Background**

1. On November 11 and November 14, 2022,<sup>2</sup> the Debtors filed with the

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

<sup>2</sup> November 11, 2022 is the petition date for all Debtors, except for Debtor West Realm Shires Inc.



United States Bankruptcy Court for the District of Delaware (the “Court”) voluntary petitions for relief under title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (as amended or modified, the “Bankruptcy Code”). The Debtors continue to operate their businesses and manage their properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. Joint administration of the Debtors’ cases (the “Chapter 11 Cases”) was authorized by the Court by entry of an order on November 22, 2022 [D.I. 128]. On December 15, 2022, the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”) appointed an Official Committee of Unsecured Creditors (the “Committee”) pursuant to section 1102 of the Bankruptcy Code [D.I. 231].

2. On January 9, 2023, the Court entered the *Order Authorizing the Employment and Retention of Landis Rath & Cobb LLP as Bankruptcy Co-Counsel, Nunc Pro Tunc to the Petition Date, Pursuant to Bankruptcy Code Section 327(a), Bankruptcy Rules 2014 and 2016 and Local Rule 2014-1* [D.I. 428] (the “LRC Retention order”) authorizing the retention and employment of LRC as the Debtors’ bankruptcy co-counsel, *nunc pro tunc* to November 11, 2022.

3. On January 9, 2023, the Court entered the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [D.I. 435] (the “Interim Compensation Order”).

4. On March 8, 2023, the Court entered the *Order (I) Appointing Fee Examiner and (II) Establishing Procedures for Consideration of Requested Fee Compensation and Reimbursement of Expenses* [D.I. 834] appointing Katherine Stadler (the “Fee Examiner”) to serve as the fee examiner in these Chapter 11 Cases and establishing certain procedures in connection therewith.

5. In accordance with the Interim Compensation Order, LRC filed twenty-three (23) monthly fee applications [D.I. 646, 815, 1222, 1389, 1557, 1821, 2105, 2275, 2800, 3634, 4208, 5121, 6870, 8311, 10726, 12929, 16384, 19615, 22099, 24025, 26060, 27502 and 27978] (collectively, the “Monthly Fee Applications”) and eight (8) interim fee applications [D.I. 1113, 1646, 2529, 4758, 9545, 17662, 24753 and 28838] (collectively, the “Interim Fee Applications” and together with the Monthly Fee Applications, the “LRC Fee Applications”) over the course of these Chapter 11 Cases. The LRC Fee Applications and all exhibits and attachments thereto are incorporated herein by reference.<sup>3</sup>

6. On October 8, 2024, the Court entered the *Findings of Fact, Conclusions of Law and Order Confirming the Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [ D.I. 26404] (the “Confirmation Order”) confirming the *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* (the “Plan”). The Plan sets forth the procedures for final requests for payment of Professional Fee Claims (as defined therein).

7. On January 3, 2025, the Plan went effective. *See* [D.I. 29197].

### **Relief Requested**

8. By this Final Fee Statement and in accordance with the Interim Compensation Order, LRC makes this application for final allowance and payment as an administrative expense of the Debtors’ estates of compensation in the amount of \$12,234,226.75 for reasonable and necessary professional services rendered and \$232,294.85 for actual and necessary expenses incurred over the course of these Chapter 11 Cases.

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<sup>3</sup> Due to the voluminous nature thereof, the LRC Fee Applications are not attached hereto. They may be obtained free of charge upon written request to the undersigned counsel or on the website maintained by the Debtors’ claims and noticing agent at <https://restructuring.ra.kroll.com/FTX>.

**a. Compensation Requested**

9. The services performed by LRC during the Final Fee Period included, among others and as set forth in detail in each of the Monthly Fee Applications, (i) preparing and/or assisting in the preparation, finalization and filing of various pleadings and orders submitted to the Court and served on parties in interest; (ii) regularly conferring with the Debtors, their other professionals and various parties-in-interest regarding issues related to the Chapter 11 Cases and the various pleadings filed herein; (iii) preparing for and participating in the hearings held in the Chapter 11 Cases; and (iv) researching and advising the Debtors and their other professionals with respect to numerous issues in connection with the Chapter 11 Cases.

10. Attached to each of the Monthly Fee Applications as Exhibit A is a detailed itemization, by project category, of all services performed by LRC with respect to the Chapter 11 Cases during the applicable monthly fee period. This detailed itemization complies with Local Rule 2016-2 in that each time entry contains a separate time allotment, a description of the type of activity and the subject matter of the activity, all time is billed in increments of one-tenth (1/10) of an hour, time entries are presented chronologically in categories, and all meetings or hearings are individually identified.

11. The timekeepers who rendered services related to each category are identified in Exhibit A to each of the Monthly Fee Applications, along with the number of hours for each individual and the total compensation sought by each category. All services for which LRC requests compensation were performed for, or on behalf of, the Debtors.

**b. Expense Reimbursement**

12. LRC incurred out-of-pocket expenses during the Final Fee Period in the amount of \$232,294.85. Attached to each of the Monthly Fee Applications as Exhibit B is a description of the expenses actually incurred by LRC in the performance of services rendered as bankruptcy co-counsel to the Debtors over the course of these Chapter 11 Cases. The expenses are broken down into categories of charges, which may include, among other things, the following charges: photocopying, printing, outgoing facsimiles, document retrieval, postage, third-party conference calls, messenger service, transcripts, computerized legal research, filing fees, working meals, secretarial overtime, and other expenses.

13. In order to more efficiently handle the voluminous copying of pleadings served and filed in these Chapter 11 Cases, LRC on occasion retained third-party duplication service providers. LRC seeks reimbursement only for the actual expenses charged by such third-party service providers as set forth in each of the applicable Monthly Fee Applications.

14. In accordance with section 330 of the Bankruptcy Code, LRC seeks reimbursement only for the actual cost of such expenses to LRC. LRC submits that all such expenses incurred were customary, necessary and related to the Chapter 11 Cases and, by this Final Fee Statement, requests final approval of reimbursement of the same.<sup>4</sup>

**Valuation of Services**

15. Professionals of LRC have expended a total of 19,066.6 hours in connection with services rendered in these Chapter 11 Cases during the Final Fee Period.

16. The amount of time spent by each of the professionals providing services

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<sup>4</sup> LRC reserves all rights with respect to any expense cap sought to be imposed or otherwise enforced by the Fee Examiner or the U.S. Trustee that is not consistent with or deviates from the Local Rules or applicable orders entered by the Court in these Chapter 11 Cases.

to the Debtors for the Final Fee Period is set forth in detail in each of the Monthly Fee Applications as Exhibit A. The rates charged are LRC's regular hourly rates of compensation for work of this nature. The reasonable value of the services rendered by LRC for the Final Fee Period as bankruptcy co-counsel for the Debtors in these Chapter 11 Cases is \$12,234,226.75.

17. LRC submits that the time entries included in Exhibit A and the expense breakdown set forth in Exhibit B attached to each of the Monthly Fee Applications are in compliance with the requirements of Local Rule 2016-2.

18. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, the amounts requested by LRC are fair and reasonable given the complexities of these Chapter 11 Cases, the time expended, the nature and extent of the services rendered, the value of such services, and the costs of comparable services other than in a case under this title.

**Certificate of Compliance and Waiver**

19. The undersigned representative of LRC certifies that she has reviewed the requirements of Local Rule 2016-2 and that the Final Fee Statement substantially complies with such rule. To the extent that the Final Fee Statement does not comply in all respects with the requirements of Local Rule 2016-2, LRC believes that such deviations are not material and respectfully requests that any such requirements be waived.

**Notice and No Prior Request**

20. Notice of this Final Fee Statement has been given to the following parties or, in lieu of, to their counsel, if known: (a) the U.S. Trustee; (b) the Committee; (c) the Fee Examiner; and (d) all parties required to be given notice in the Interim Compensation Order. LRC submits that no other or further notice is necessary.

21. No prior request for the relief sought in this Final Fee Statement has been

made to this or any other Court.

WHEREFORE, LRC respectfully requests that the Bankruptcy Court (i) approve the Final Fee Statement and (ii) grant such further relief as is just and proper.

Dated: January 10, 2025  
Wilmington, Delaware

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/s/ Kimberly A. Brown

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